

EXHIBIT D

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
2 EASTERN DIVISION

3 - - -

4 ALISON O'DONNELL,

5 Plaintiff,
6 vs.

Case No. 1:16-cv-2450
Judge Donald E. Nugent

7 UNIVERSITY HOSPITALS
7 HEALTH SYSTEM, et al.,

8 Defendants.

9 - - -

10 DEPOSITION OF SUMANA NARASIMHAN, M.D.
11 Tuesday, August 29, 2017

12 - - -

13 The deposition of SUMANA NARASIMHAN, M.D.,
14 a Defendant herein, called for examination by
15 the Plaintiff under the Federal Rules of Civil
16 Procedure, taken before me, Diane M. Stevenson,
17 a Registered Diplomate Reporter, Certified
18 Realtime Reporter, and Notary Public in and for
19 the state of Ohio, pursuant to notice, at
20 Vorys, Sater, Seymour & Pease LLP, 200 Public
21 Square, Suite 1400, Cleveland, Ohio, commencing
22 at 6:45 p.m., the day and date above set forth.

23

24

25 Stevenson Reporting Service, Inc.
2197 Macon Court Westlake, Ohio 44145
 440.892.8600 diane@nls.net

1 there.

2 It is not just, "Oh, you just get extra
3 time," for example.

4 Q. Did you agree that Dr. Matthews needed more
5 time in the program in order to complete it?

6 A. I did feel that would be helpful.

7 Q. Then are the Wednesday -- are you familiar with
8 the Wednesday conferences?

9 A. Yes.

10 Q. Are those important to the program?

11 A. They are essential to the program.

12 Q. How so? Why, in your view, are they essential
13 to the program?

14 A. Because the Wednesday conferences allow for a
15 free exchange of ideas, also the presentation
16 of cases that the service is seeing that whole
17 week, plus any interesting case that could be
18 discussed.

19 There is also time to discuss a certain
20 topic. There is also journal review in that
21 time that can be scheduled where we review the
22 literature on the latest article on something,
23 or whatever, and do an in-depth review.

24 The Wednesday conferences are also a time
25 when we invited outside doctors to come in,

1 outside our specialties, sometimes visiting
2 people, to come and talk to us.

3 We would sometimes have psychiatry come in
4 and talk to us, psychology/psychiatry talk to
5 us about, say, diabetes, do like a joint
6 conference.

7 It was really the part of the week which
8 allowed for us to get away from a routine, see
9 the patient, write the note, give the
10 assessment to "How is everybody thinking?"

11 And if somebody went to a national
12 conference, they would come back and give the
13 gist of what they learned in that conference.
14 And that was the expectation.

15 It allowed us to practice our
16 presentations. Like if I was going to a
17 national meeting and I had a poster, I would
18 bring the poster to the Wednesday conference.
19 If I had an oral, I would actually practice
20 with somebody timing and everybody writing
21 their comments and getting that feedback from a
22 friendly audience before you went to a national
23 audience.

24 So it was really useful for both faculty
25 and fellows.